

1 **FTC COMMUNICATIONS INC.**

2 **DIRECT TESTIMONY OF N. DOUGLAS HORNE**

3 **BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

4 **DOCKET NO. 2007-193-C**

5
6
7 **Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS?**

8
9 A. My name is N. Douglas Horne. My business address is: 1101 East Main Street, P.O. Box
10 588, Kingstree, South Carolina 29556.

11 **Q. WHAT IS YOUR POSITION WITH FTC?**

12
13 A. I am the Chief Operating Officer of FTC Communications, Inc. d/b/a FTC Wireless
14 ("FTCC").

15 **Q. HOW LONG HAVE YOU HELD THAT POSITION?**

16
17 A. Since November 1, 2004.

18
19 **Q. PRIOR TO YOUR BECOMING CHIEF OPERATING OFFICER OF FTC, WHAT**
20 **OTHER POSITIONS HAVE YOU HELD IN THE TELECOMMUNICATIONS**
21 **FIELD?**

22
23 A. I have been employed by Farmers Telephone Cooperative in various capacities for over 14
24 years. During this time I have served as Chief Operating Officer Farmers Telephone
25 Cooperative and subsequently became the Chief Operating Officer of FTC Communications.
26 Prior to joining the Farmers Telephone Cooperative, I served in several executive roles with
27 other telecommunications carriers including: Contel-Division Marketing Administrator-
28 Gulf Division; Contel - Information Technology Planner Office of Information Resources
29 for the State of South Carolina; Director of Operator Services for TelcomUSA; Director

1 Alternative Sales Channels, MCI Southeastern Division; and Vice President and General
2 Manager of Interquest, a subsidiary of the Interstate Telephone Company.

3 **Q. WHAT ARE YOUR BASIC RESPONSIBILITIES ON BEHALF OF FTCC?**

4
5 A. As COO of FTCC I am responsible for the day-to-day operations of both FTC Wireless and
6 Farmers Long Distance. These responsibilities include oversight of network operations,
7 marketing, customer service and all aspects of the operation.

8 **Q. PLEASE DESCRIBE THE COMPANY'S WIRELESS OPERATIONS.**

9
10 A. FTCC is a wireless common carrier utilizing its own facilities to provide wireless voice and
11 data services within the South Carolina counties of Clarendon, Lee, Sumter and
12 Williamsburg and certain portions of Florence and Georgetown counties. FTC has been
13 providing service to these areas since 1997, first as a reseller, and then as a facilities based
14 carrier beginning in March of 2001. FTC's parent owner, Farmers Telephone Cooperative,
15 Inc. ("Farmers Cooperative"), is a cooperative which has provided high-quality
16 telecommunications services, including wireline service, to rural areas of South Carolina for
17 over fifty-five years.

18 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

19
20 A. The purpose of my testimony is to support the May 9, 2007, application of FTCC to be
21 designated by this Commission as an Eligible Telecommunications Carrier or "ETC." The
22 designation of FTTC as an ETC will enable FTCC to receive federal universal service
23 funding which is critical and necessary for FTCC to be able to fully carry out its mission to
24 provide wireless service throughout its rural South Carolina service area. My testimony will
25 attest to the willingness of FTCC to comply both with the standards for ETCs established by
26 the Federal Communications Commission (or "FCC") and the standards under consideration
27 by this Commission. In addition, my testimony will demonstrate the specificity with which

1 FTCC would utilize universal service funding in a manner consistent with the purposes for
2 which it is intended.

3 **Q. WHY IS FTCC SEEKING ETC STATUS?**
4

5 A. By seeking status as an ETC, it is the intent of FTCC, and its rural Cooperative parent, to
6 advance universal services in the areas of rural South Carolina where it has a demonstrated
7 commitment of service to its customers and community member owners. Accordingly, it is
8 incumbent upon FTCC to seek ETC designation in the interests of its rural cooperative
9 member owners, its customers and the overall public interest.

10 **Q. IN YOUR CAPACITY AS COO, HAVE YOU FAMILIARIZED YOURSELF WITH**
11 **THE FCC'S REQUIREMENTS THAT MUST BE SATISFIED BEFORE FTCC CAN**
12 **BE DESIGNATED AS AN ETC?**

13 A. Yes. ETC designation requires that the carrier offer the specific services that are designated
14 for support under federal requirements either by using its own facilities or through a
15 combination of its own facilities and resale of another carrier's facilities. The supported
16 services are:

- 17 (1) voice grade access to the public switched network;
18
19 (2) local usage;
20
21 (3) Dual Tone Multifrequency ("DTMF") signaling or its functional equivalent;
22
23 (4) single-party service or its functional equivalent;
24
25 (5) access to emergency services, including 911 and enhanced 911;
26
27 (6) access to operator services;
28
29 (7) access to interexchange services;
30
31 (8) access to directory assistance; and
32
33 (9) toll limitation for qualifying low-income customers.
34
35

1 **Q. WILL YOU PLEASE DESCRIBE HOW FTCC EITHER MEETS OR WILL MEET**
2 **EACH OF THESE CRITERIA ESTABLISHED BY THE FCC?**

3
4 A. Yes, I will summarize each:

5
6 Voice Grade Access To The Public Switched Network - FTCC provides customers with the
7 ability to place and receive voice grade calls to and from other customers utilizing FTCC's
8 services, and to send and receive calls from all customers on the public switched network.
9 FTCC provides this voice grade access to customer through the interconnection of its
10 facilities to the public switched network in accordance with interconnection agreements with
11 local exchange carriers and interexchange carriers.

12 Access To Free Of Charge "Local Usage" Defined As An Amount Of Minutes Of Use Of
13 Exchange Service - If FTCC is designated an ETC, FTCC will implement a service plan
14 consistent with this requirement. My understanding is that in accordance with the FCC's
15 guidance, the proposed service plan of an ETC Applicant must demonstrate that it offers a
16 local usage plan comparable to the one offered by the incumbent LEC in the service areas
17 for which it seeks designation." This is exactly what FTCC will do.

18 FTCC's current calling plans are often considered by consumers to be superior to traditional
19 incumbent LEC service offerings because there is no rate distinction between "local" and
20 "long distance" calls. The designation of FTCC as an ETC and the receipt of universal
21 service support will enable FTCC to offer customers a new "service offering." As indicated
22 in our Petition, this plan, made possible by ETC designation, is designed to meet the needs
23 of those customers whose primary interest is in obtaining a basic, low-cost wireless
24 connection to the network. The "service offering" will provide basic unlimited local calling
25 area at affordable rates.

26 Dual Tone Multi-frequency Signaling or its Functional Equivalent - FTCC currently uses

1 out-of-band digital signaling and in-band multi-frequency signaling that is the functional
2 equivalent to DTMF signaling in accordance with the FCC's requirements. My
3 understanding is that the FCC has recognized that instead of Dual Tone Multi-frequency
4 signaling wireless carriers may use out-of-band signaling mechanisms as an alternative to
5 DTMF signaling.

6 Single Party Service - FTCC only offers "single party service." Each customer utilizes a
7 dedicated path when using our service.

8 Access to Emergency Services – FTCC is very aware of the need for emergency services
9 and provides its customers with the ability to access emergency services by dialing "911". In
10 the more rural and remote areas within the FTC service area, the provision of emergency
11 services could easily be enhanced if it was affordable to provide greater wireless coverage
12 in those areas. If the Commission grants FTCC the requested ETC designation and FTCC
13 receives USF support, FTCC will be able to undertake its network plan to deploy additional
14 coverage throughout its service area and enhance the provision of emergency services
15 available to consumers when they reside in or travel through the more remote parts of
16 FTCC's rural service area.

17 Access to Operator Services – FTCC meets this requirement by providing customers access
18 to automated and live operator services by dialing "0."

19 Access to Interexchange Services – The FTCC network provides customers with access to
20 interexchange services. The FTCC network enables its customers to send and receive calls
21 to and from customers located anywhere on the public switched network.

22 Directory Assistance – FTCC provides its customers with access to directory assistance or
23 "information" when the customer dials "411."

1 Toll Limitation - Because FTCC's existing calling plans do not distinguish between local
2 and toll calls, and because FTCC is not currently designated as an ETC, FTCC's customers
3 have no current need for toll limitation. If the Commission grants FTCC's request for
4 designation as an ETC, FTCC will offer toll limitation service to address the needs of low-
5 income users that seek a basic, low-cost wireless connection to the network. Lifeline
6 customers in need of toll limitation will be offered a "service" that will limit the use of the
7 wireless service for calls beyond the amount that the Lifeline Customer wants to pay for.

8 **Q. THE FCC RULES REQUIRE AN ETC TO ADVERTISE THE AVAILABILITY OF**
9 **UNIVERSAL SERVICES THROUGHOUT ITS SERVICE AREA. HOW DOES**
10 **FTCC PROPOSE TO FULFILL THIS REQUIREMENT?**
11

12 A. As COO, I will ensure that FTCC utilizes all available forms of local media and other forms
13 of advertising to inform the general public of the availability of the supported universal
14 services. I will also work with local social service agencies to ensure that qualifying low-
15 income individuals are informed of the opportunity to utilize lifeline and link-up funding to
16 obtain universal wireless services from FTCC if the requested ETC designation is granted.
17 The commitment to provide service and to ensure that all in our service area are aware of the
18 services we provide is fundamental to the operations of FTCC and its parent, the Farmers
19 Telephone Cooperative.

20 **Q. IN ADDITION TO THE FCC REQUIREMENTS YOU HAVE ADDRESSED, THE**
21 **FCC ADOPT ADDITIONAL CRITERIA FOR THE DESIGNATION OF ETCS**
22 **THAT THE COMMISSION MAY USE. WHAT ARE THESE CRITERIA?**
23

24 A. The FCC determined that ETCs designated by the FCC must:
25 (1) commit to provide service throughout the ETC designated area to all customers making a
26 reasonable request;
27
28 (2) demonstrate the ability to remain functional in an emergency;
29
30 (3) demonstrate that it will satisfy the applicable consumer protection and service quality
31 standards;

1
2 (4) show that it offers local usage plans comparable to the one offered by the incumbent
3 LEC; and,
4

5 (5) certify that it may be required to provide equal access to long distance carriers in the
6 event that no other ETC is providing equal access within the service area.
7

8 **Q. WILL YOU PLEASE EXPLAIN HOW FTCC WILL MEET EACH OF THESE**
9 **ADDITIONAL CRITERIA?**

10
11 A. Yes, I will summarize each:

12 **(1) Provision of service throughout the FTCC designated area to all customers making**
13 **a reasonable request**

14
15 FTCC will follow its existing practice to provide service on a timely basis to requesting
16 customers within the FTCC's service area where FTCC's network already provides
17 coverage to the potential customer's premises. In all instances where a request for service is
18 made by a potential customer within its existing network coverage, FTCC will provide
19 service immediately upon request.

20 If a potential customer who requests service is outside the range of FTCC's existing
21 coverage area, I will establish procedures to ensure that FTCC follows the six-step process
22 specified by the FCC as a requirement under those circumstances and provide service within
23 a reasonable time if service can be provided at reasonable cost by:

24 (1) Modifying or replacing the requesting customer's equipment;

25 (2) Deploying a roof-mounted antenna or other equipment;

26 (3) Adjusting the nearest cell tower;

27 (4) Adjusting network or customer facilities;

28 (5) Reselling services from another carrier's facilities to provide service; or

29 (6) Employing, leasing or constructing an additional cell site, cell extender, repeater,
30 or other similar equipment.
31
32

1 FTCC's commitment to meet the service provision requirements will be measured by its
2 annual reports to both the Commission and to the FCC which will indicate the number of
3 requests for service from potential customers within its service area that were unfulfilled
4 during the past year, if any. In the event any order was unfulfilled, FTCC will explain in
5 detail the steps it undertook to provide service, in accordance with the requirements.

6 **(2) The ability to remain functional in an emergency**

7 FTCC is prepared for emergencies. FTCC has battery backup or permanent generators at all
8 of its cell sites. FTCC has also acquired cellular on wheels or "COW" which is a portable
9 cell site that can be driven to locations where emergency conditions have disrupted service
10 or where a site experiences a spike in traffic. In the event of an emergency outage on the
11 network, FTCC has deployed the capability of route diversity to maintain traffic flow.

12 **(3) The applicable consumer protection and service quality standards**

13 FTCC maintains conveniently located regional offices to facilitate the provision of service to
14 the public, and its technical personnel are available to deal with emergency situations seven
15 days a week, twenty-four hours a day. FTCC has adopted the Cellular Telecommunications
16 and Internet Association's (the "CTIA") Consumer Code for Wireless Service and is
17 committed to compliance with the CTIA Code not only throughout the areas where FTCC
18 seeks ETC designation, but throughout its entire service area. It is my understanding that
19 compliance with the CTIA Code will satisfy the FCC's requirement for an ETC to meet
20 applicable consumer protection and service quality standards. Both the Commission and
21 the FCC will be able to monitor FTCC's commitment to consumer protection and service
22 quality. If FTCC is designated an ETC by the Commission, it will report annually both to
23 the Commission and the FCC the number of customer complaints it receives each year per

1 1000 handsets in order to enable the Commission to measure how well FTCC meets its
2 commitment to consumer protection and service quality.

3 **(4) Local usage plans comparable to the one offered by the incumbent LEC**

4 I have previously addressed this commitment in response to the FCC requirement that an
5 ETC offer access to local usage without additional usage charges. FTCC will, as I
6 previously described, offer a new “service offering” to provide customers with unlimited
7 connection to its local wire and wireless network if it is designated an ETC. Wireless plans
8 have service aspects not easily compared to the incumbent LEC such as local wireless
9 calling areas for FTCC that exceed that of the ILEC and the wireline ILEC local plan has is
10 not time sensitive. The value to the local customer must be considered. The unique benefits
11 of the wireless service provide comparable or better service than that offered by the ILEC in
12 terms of the value. For example, a wireless customer has mobility and toll free long
13 distance opportunities. FTCC will offer free of charge access to emergency services. FTCC
14 will offer calling plans that bundle local and long distance calling, so its customers may
15 select a local calling area most appropriate for his or her needs. Because the wireline and
16 wireless plans have features making absolute comparison impossible, the plan offered by
17 FTCC may not match up with the ILEC item by item but I believe FTCC’s offering, in terms
18 of value, is comparable if not better than the ILEC local usage plan.

19 **(5) Provision of equal access to long distance carriers in the event that no other ETC is**
20 **providing equal access within the service area.**

21
22 As noted in our petition, FTCC certifies that it will provide equal access to long distance
23 carriers in the event that no other ETC is providing equal access within the service area in
24 which it serves as an ETC. I must take a moment, however, to note that the incumbent LEC
25 is our affiliate, the Farmers Telephone Cooperative which is an ETC and required, as a

1 regulated LEC, to provide equal access. As a result, FTCC commits to provide equal access
2 throughout its period of service.

3 **Q. DOES FTCC MEET THE ETC REQUIREMENT TO PROVIDE THE SUPPORTED**
4 **SERVICES USING ITS OWN FACILITIES OR A COMBINATION OF ITS OWN**
5 **FACILITIES AND THE FACILITIES OF OTHER CARRIERS?**
6

7 A. Yes, FTCC provides the supported services using its own facilities or a combination of its
8 own facilities and the resale of another carrier's service. If FTCC is designated as an ETC,
9 FTCC will provide its new "service offering" over its existing network enhanced by the
10 improvements it plans to make if it receives Universal Service Fund support. FTCC
11 primarily utilizes its own network infrastructure in its own service area including antennae,
12 cell-sites, towers, and trunking. FTCC currently has deployed 95 cell sites located
13 throughout its service area to provide digital wireless service. Each of these sites are
14 connected via landline T1's back to a central point of interface which resides in the Farmers
15 Telephone Cooperative tandem office in Sumter, S.C. These individual T1's are
16 multiplexed onto multiple high capacity transport facilities that connect to AT&T's wireless
17 mobile switching office in Columbia, S.C. where the calls are switched to the public
18 switched network or to other wireless users on the network.

19 **Q. PLEASE IDENTIFY THE SPECIFIC AREA IN WHICH FTCC SEEKS ETC**
20 **DESIGNATION.**
21

22 A. FTCC seeks designation as an ETC designation in the entire "rural" telephone company
23 study area of the Farmers Telephone Cooperative which FTCC is licensed to serve in its
24 entirety.

25 **Q. COULD THE GRANT OF FTCC'S REQUEST FOR ETC DESIGNATION RESULT**
26 **IN CREAM-SKIMMING?**
27

28 A. No, "cream-skimming" cannot result from the designation of FTCC as an ETC. The FCC's
29 concern about cream skimming arises when a carrier seeking ETC status proposes to serve

1 some, but not all, of a study area served by an incumbent rural local exchange carrier. This
2 circumstance creates the possibility that the competitive ETC serves only the less costly to
3 serve customers and the more lucrative customers. This is not and cannot be the case with
4 FTCC's request for ETC designation because FTCC seeks designation as an ETC in the
5 entire study area served by the Farmers Telephone Cooperative, and not just in a part of the
6 service area.

7 **Q. HOW WILL FTCC USE THE UNIVERSAL SERVICE FUNDS IT RECEIVES IF IT**
8 **IS DESIGNATED AN ETC?**
9

10 **A.** FTC will apply all the funds to the capital investment and associated expenses required to
11 expand, maintain and enhance service coverage throughout our rural area as well as increase
12 emergency restoration capabilities. The very reason we initially obtained the rights to
13 provide wireless was to ensure that the members of our community - who are the owners
14 and users of the Farmers Telephone Cooperative - would have access to wireless services
15 throughout the Cooperative's service area. Universal service support will enable FTCC to
16 expand coverage into unserved areas of our rural territory and to significantly enhance
17 service in other parts of our service area. In those parts of service area that have coverage,
18 there are often variances in signal strength due to heavy foliage and other structural barriers;
19 these variances can affect call quality. High cost support will enable FTCC to deploy needed
20 signal enhancing technology to improve these situations as well as engage in further network
21 upgrades to ensure that rural wireless customers receive the benefits of the advances in
22 wireless technology enjoyed by consumers located in urban areas and rural areas throughout
23 the nation served by wireless carriers that receive universal service support. FTCC also
24 plans to utilize universal service fund support to expand its emergency restoration

1 capabilities. The capital required to reach 100% coverage of FTC's licensed area is
2 extensive but we believe this is necessary for universal service.

3 A map indicating the additional sites required to achieve this goal can be found in the
4 Supplemental Proprietary Exhibit 1 to our Petition. FTCC has developed a five-year plan
5 that describes with specificity for the first year of the proposed plan improvements and
6 upgrades to FTCC's network on both a cell site by cell site basis and a wire center-by-wire
7 center basis throughout its proposed designated ETC service area and generally describes
8 improvements and expenditures for the remaining four years. Our plan demonstrates how
9 FTCC will specifically use universal service funds to improve signal quality, coverage
10 capacity, and emergency back-up services. In addition to the submission of this five-year
11 plan, FTCC will commit to provide the Commission with annual updates demonstrating its
12 planned utilization of USF proceeds for the subsequent five-year period or any subsequent
13 period as directed by the Commission. This will ensure that the Commission is provided
14 specific detailed information on a continuing basis to assist the Commission in its
15 determination regarding its annual certification of ETCs and their utilization of Universal
16 Service Funds.

17 The first year of the proprietary five-year Plan that FTCC has submitted is detailed. In the
18 planning process, I look to data and customer needs to evaluate service requirements on an
19 ongoing basis in order to prioritize where our available funds should be invested. The
20 variables inherent in the planning process prevent reliable and specific plans beyond twelve
21 months but FTCC will commit to annually update its plan to provide more specific
22 information twelve months out. Our plan includes the projected start date and completion
23 date for each improvement and the estimated amount of investment for each project that

24 FTCC proposes to implement as a result of the receipt of Universal Service Funds. The

1 specific information provided in the Plan demonstrates the geographic areas where the
2 improvements will be made on a wire center by wire center basis as well as on a cell site by
3 cell site basis. In addition, the proprietary plan provides population information to
4 demonstrate the approximate number of individuals residing in the areas where FTCC
5 proposes to utilize the universal service funds to improve service. The benefits of the use of
6 the Universal Service Funds in the targeted areas, however, are not limited to those who
7 reside in the areas. Everyone who travels through the FTCC service area will be potential
8 beneficiaries of the planned improvements.

9 Q. **DOES FTCC'S REQUEST FOR ETC DESIGNATION DIFFER IN ANY SPECIFIC**
10 **ASPECTS FROM THE PETITION FOR ETC DESIGNATION FTCC SUBMITTED**
11 **IN 2003?**

12
13 A. Although I was not the COO of FTCC at the time of our initial request for designation as an
14 ETC, I have thoroughly reviewed our 2003 Petition and the concerns of the Commission
15 raised in its Order denying the designation of FTCC as an ETC at that time.

16 The Order reflects that the Commission was not convinced that the grant of the designation
17 of FTCC would serve the public interest. In addition to the broad concerns regarding the
18 utilization of finite universal service fund resources, the Commission expressed specific
19 concerns with respect to whether FTCC's proposed universal service offering would serve
20 the needs of customers who need basic low-cost connection to the network and unlimited
21 local calling. In response to this need, FTCC will implement the "service offering"
22 described both in our Petition and in this testimony. The provision of universal service
23 funding will enable FTCC to offer this service plan and serve the public interest by enabling
24 rural citizens residing in the FTCC service area, who may not otherwise be able to afford
25 wireless service, to utilize wireless service.

1 The Order rejecting the initial FTCC request for designation as an ETC also reflects concern
2 that the earlier Petition and supporting evidence did not provide specific information to
3 assist the Commission in making an intensive fact-finding determination of whether the
4 public interest would have been served by the designation of FTCC as an ETC. In the
5 preparation of the current Petition under consideration, I directed that we provide very
6 specific information to demonstrate how FTCC would utilize universal service funding to
7 offer new services at low rates, and how universal service funding will be allocated and
8 used to build new towers and sites to bring quality service to specifically identified areas of
9 rural South Carolina where market forces alone would not justify investment in
10 infrastructure. FTCC has developed a proprietary plan demonstrating step by step the build
11 out plan and use of potential Universal Service Funds. The proprietary plan has been
12 submitted to the Commission for its consideration in order to provide it with the very
13 specific facts it requires in the exercise of its discretion to determine whether the application
14 to be designated as an ETC will serve the public interest. In addition to the detailed
15 submissions that FTCC has provided with its Petition, FTCC stands committed on a
16 continuing basis to provide the Commission with similar detail and reporting on an ongoing
17 basis in order to ensure the Commission that it has the information necessary for it to
18 determine that the utilization FTCC makes of Universal Service Funds is consistent with the
19 public interest.

20 **Q. WILL DESIGNATION OF FTC AS AN ETC PROMOTE THE PUBLIC INTEREST?**

21
22 A. The designation of FTCC as an ETC in the Farmers Telephone Cooperative service area will
23 enable FTCC to provide service to customers who may not otherwise be able to obtain
24 wireless service. The “service offering” we will offer will extend the availability of wireless
25 service to those customers that may seek a low-cost connection to basic service with

1 unlimited local coverage, as the Commission previously indicated should be included in a
2 universal service offering by an ETC. Designation of FTCC as an ETC will also produce
3 the benefits of increased wireless coverage and emergency services as demonstrated in the
4 proprietary two-year plan FTCC has developed. Universal service support will enable
5 FTCC to construct facilities to offer service to currently unserved areas and improve the
6 quality of service in areas of FTCC's rural service area where market conditions alone
7 would not warrant further investment.

8 The public interest benefits that I have described in this testimony, and the implementation
9 of the detailed two year plan developed by FTCC that will produce these benefits, can be
10 achieved with no counter balancing detrimental impact on the public interest. The
11 regulatory concerns regarding the protection of the resources of the universal service fund
12 are further addressed in the testimony of my colleague, Mr. Nesmith. The single greatest
13 public interest result that will occur if the Commission designates FTCC as an ETC is the
14 increased provisioning of network facilities and basic service offerings together with the
15 improvement in the telecommunications services available to citizens both residing in and
16 traveling through the FTCC service area.

17 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

18
19 **A.** Yes, thank you.

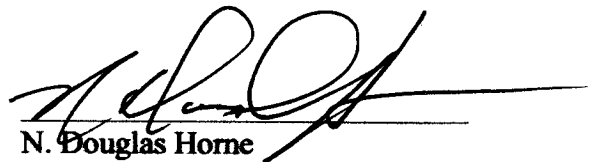
**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

IN RE:	Application of FTC Communications, Inc.)	
	DBA FTC Wireless for Designation as an)	UTILITIES DEPARTMENT
	Eligible Telecommunications Carrier)	
	Pursuant to Section 214 (e)(2) of the)	DOCKET NO. 2007-193-C
	Communications Act Of 1934)	

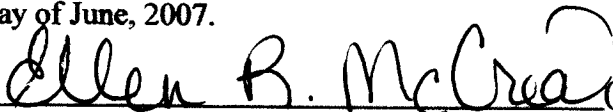
AFFIDAVIT OF N. DOUGLAS HORNE

I, N. Douglas Horne, under penalty of perjury, affirm and state this 29 day of June, 2007:

1. My name is N. Douglas Horne. I am Chief Operating Officer of FTC Communications, Inc. My office is located at 1101 E. Main Street, Kingstree, South Carolina 29556.
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of FTC Communications, Inc., having been prepared in written form for introduction into evidence in the above-captioned docket.
3. I have knowledge of the matters set forth therein. I hereby affirm that my answers contained in the attached testimony to the questions propounded, including any attachment thereto, are true and accurate to the best of my knowledge, information and belief.


N. Douglas Horne

SWORN to before me this 29
day of June, 2007.


NOTARY PUBLIC FOR SOUTH CAROLINA
My Commission Expires: 11-23-09

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

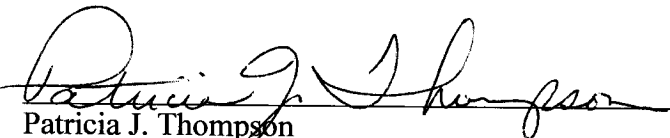
IN RE: Application of FTC Communications, Inc.)	UTILITIES DEPARTMENT
DBA FTC Wireless for Designation as an)	
Eligible Telecommunications Carrier)	DOCKET NO. 2007-193-C
Pursuant to Section 214(e)(2) of the)	
Communications Act of 1934)	

CERTIFICATE OF SERVICE

This is to certify that I, Patricia J. Thompson, an employee with Schwartz, McLeod, DuRant & Jordan, have this date served one (1) copy of the attached Direct Testimony of N. Douglas Horne in the above-referenced matter to the persons named below by causing said copies to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below.

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July 2, 2007

Sumter, South Carolina